

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF MISSISSIPPI
OXFORD DIVISION**

HAROLD HARRIS; PASTOR ROBERT
TIPTON, JR.; DELTA SIGMA THETA
SORORITY, INC., DESOTO COUNTY
MS NAACP UNIT 5574

Plaintiffs,

No. 3:24-cv-00289-GHD-RP

v.

DESOTO COUNTY, MISSISSIPPI;
DESOTO COUNTY BOARD OF
SUPERVISORS; and DESOTO COUNTY
ELECTION COMMISSION.

Defendants.

PLAINTIFFS' NOTICE OF DEPOSITIONS

PLEASE TAKE NOTICE that, pursuant to Rules 26 and 30 of the Federal Rules of Civil Procedure, counsel for Plaintiffs Harold Harris, Pastor Robert Tipton, Jr., Delta Sigma Theta Sorority, Inc., and DeSoto County MS NAACP Unit 5574 will proceed to take the deposition of the following:

1. Chris Watson – Friday, July 11, 2025 at 9:30 a.m.
 - Location: Phelps Dunbar LLP, 105 E. Main Street, Suite 201, Tupelo, MS 38804 and virtual or telephonic option
2. Mark Gardner – Monday, July 14, 2025 at 9:30 a.m.
3. Lee Caldwell – Tuesday, July 15, 2025 at 9:30 a.m.
4. Vanessa Lynchard – Wednesday, July 16, 2025 at 9:30 a.m.
5. Robert Foster – Thursday, July 17, 2025 at 9:30 a.m.

6. Ray Denison – Friday, July 18, 2025 at 9:30 a.m.
7. Michael Lee – Monday, July 21, 2025 at 9:30 a.m.
8. Jessie Medlin – Tuesday, July 22, 2025 at 9:30 a.m.

Except for Chris Watson noted above, the depositions will be held at Bridgforth, Buntin & Emerson, PLLC, 5293 Getwell Road, Southaven, MS 38672 with virtual or telephonic option.

Details regarding the court reporter service will be emailed to those participating once all arrangements are finalized. The depositions shall be taken before a Notary Public or some other officer authorized by law to administer oaths for use at trial. The depositions will be taken by oral examination with a written and/or sound and visual record made thereof (e.g., videotape, LiveNote, etc.). The depositions will be taken for the purposes of cross-examination, discovery, and for all other purposes permitted under the Federal Rules of Civil Procedure or any other applicable law.

Dated: July 2, 2025

/s/ Joshua Tom

Joshua Tom (Miss. Bar No. 105392)
ACLU OF MISSISSIPPI
101 South Congress Street
Jackson, MS 39201
Telephone: (601) 354-3408
jtom@aclu-ms.org

Daniel J. Hessel*
Ruth Greenwood*
ELECTION LAW CLINIC
HARVARD LAW SCHOOL
6 Everett Street, Ste. 4105
Cambridge, MA 02138
(617) 496-0222
dhessel@law.harvard.edu
rgreenwood@law.harvard.edu

Brenda Wright*
Victor Genecin*
Maia Cole*
Breanna Williams*
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
40 Rector Street, 5th Floor
New York, NY 10006
Telephone: (212) 965-2200
Facsimile: (212) 226-7592
bwright@naacpldf.org
vgenecin@naacpldf.org
mcole@naacpldf.org
bwilliams@naacpldf.org

Victor Jones*
NAACP LEGAL DEFENSE AND
EDUCATIONAL FUND, INC.
700 14th Street NW, Suite 600
Washington, DC 20005
Telephone: (202) 216-2720
Facsimile: (202) 682-1312
vjones@naacpldf.org

Attorneys for Plaintiffs

**Admitted Pro Hac Vice*

CERTIFICATE OF SERVICE

I, Joshua Tom, do certify that on this day I filed the foregoing with the ECF System which sent notification to all counsel of record.

This the 2nd day of July, 2025.

/s/ Joshua Tom
Joshua Tom